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HINE**ATLANTA CINCINNATI COLUMBUS LOS ANGELES NEW YORK
CHICAGO CLEVELAND DAYTON MINNEAPOLIS WASHINGTON, D.C.

July 29, 2025

MEMO ENDORSED

Via ECF

Hon. Louis L. Stanton
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/30/25**RE: *The City of New York v. Magellan Technology, et al.*, No. 23-5880-LLS-OTW**

Dear Judge Stanton:

Pursuant to Individual Practice Rules 1.A and 1.E, and L.R. 7.1(d), Defendants Magellan Technology, Inc., Ectoworld, LLC d/b/a Demand Vape, and Matthew J. Glauser (collectively, "Defendants"), and Plaintiff the City of New York ("the City") in the above captioned matter respectfully submit this Letter Motion for a sixty-day extension of time to complete discovery from July 30, 2025 to September 29, 2025. This is the second request to extend time to complete discovery.

The parties have been actively engaged in discovery, including the exchange of discovery requests, document productions, and depositions. However, the parties will be unable to complete discovery by the current deadline of July 30, 2025. The parties believe an additional sixty days will provide adequate time to complete necessary discovery. Accordingly, the parties request the Court extend the deadline to complete fact discovery sixty days to September 29, 2025. Defendants have attached a proposed revised scheduling order to reflect the remaining case affected by the requested extension.

So
Ordered
Louis L
Stanton
7/30/25

If the above is satisfactory to the Court, Defendants respectfully request that the requested extension of time to complete discovery be "So Ordered."

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Krupa A. Patel

Krupa Patel

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THOMPSON
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July 29, 2025
Page 2

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July 29, 2025
Page 3

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2025, I caused to be served on counsel of record, electronically via the ECF, a true and correct copy of the foregoing Joint Letter Motion.

s/ Krupa A. Patel
Krupa A. Patel

cc: All counsel of record (via ECF)

The City of New York v. Magellan Technology, et al., No. 23-5880-LLS-OTW

PROPOSED REVISED SCHEDULING ORDER

	<u>Current Date</u>	<u>New Date</u>
Completion of Discovery	July 30, 2025	September 28, 7/2025
Dispositive Motions	30 days following completion of all fact and expert discovery	
Plaintiff's Pretrial Order	45 days following completion of all fact and expert discovery	
Joint Pre-Trial Order	45 days following City's service of proposed pretrial order	
Final Pretrial Conference	TBD	TBD